

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

DEBORAH L. HORNE  
5729 Moravia Road  
Baltimore, MD 21206

Plaintiff,

v.

CRESTLINE HOTELS & RESORTS, LLC  
d/b/a HYATT PLACE BALTIMORE BWI  
a/k/a GILL HOSPITALITY, LLC  
940 International Drive  
Linthicum Heights, MD 21090

Serve On: Resident Agent  
Amrit Singh  
940 International Drive  
Linthicum Heights, MD 21090

Defendants.

Civil Action No.: \_\_\_\_\_

**JURY TRIAL DEMANDED**

**COMPLAINT FOR EMPLOYMENT DISCRIMINATION**

The Plaintiff, DeBorah L. Horne, (hereinafter referred to as "Plaintiff" ), by and through his attorney, Robert E. Joyce, sues the above captioned Defendants and in support states as follows:

1. Plaintiff is a resident of the state of Maryland residing at 5729 Moravia Road, Baltimore City, Maryland.
2. Defendant is a hospitality services corporation with its principal place of business located at 940 International Drive, Linthicum Heights, Maryland.
3. This is a civil action brought under 42 U.S.C. §§2000(e), et seq. (Title VII of the Civil Rights Act of 1964, as amended) for employment discrimination on the basis of

race, color, religion, sex and/or national origin.

4. Plaintiff other and further brings this action under 29 U.S.C. §§621, et seq. (Age Discrimination in Employment Act of 1967, as amended) for employment discrimination on the basis of age. Plaintiff was 58 years old at the time of her wrongful discharge and her date of birth is: 7/3/1960.

5. Plaintiff other and further brings this action under 29 U.S.C. §§701, et seq., (Rehabilitation Act of 1973) for employment discrimination on the basis of a disability by and employer which constitutes a program or activity receiving federal financial assistance.

6. Plaintiff other and further brings this action under 42 U.S.C. §§12101, et seq., (The Americans with Disabilities Act of 1990) for employment discrimination on the basis of disability. Plaintiff brings this case because the Defendant, by and through its agent, servant and/or employee Dawn McManus, wrongfully terminated her employment on August 14, 2018. Plaintiff was a front desk manager at the hotel who worked the overnight shift. Plaintiff, an African American woman, was terminated after a guest complaint regarding her intervention in an argument with the guest and another hotel employee. In fact, this termination was based on race and age because Ms. McManus, a Caucasian woman, only terminated or reprimanded people of color who worked for Defendant in the mere 2 weeks she was on duty at the hotel as Task Force Manager. Even prior to this incident, Ms. McManus had displayed a general dislike to the Plaintiff since she had arrived at the hotel.

7. As stated above, these actions, policies, rules and regulations enacted, implemented and enforced against Plaintiff, and others, were designed specifically to discriminate against Plaintiff in their terms because of Plaintiff's family's race, color, religion, sex, familial status, disability and/or national origin in violation of 42 U.S.C. §§2000(e), et seq.,

29 U.S.C. §§621, et seq., 29 U.S.C. §§701, et seq. and 42 U.S.C. §§12101, et seq.

8. The Defendant employer employs approximately 201 - 500 employees.

9. The discrimination as aforesaid occurred on August 9, 2018.

10. Plaintiff filed charges with the Equal Employment Opportunity Commission (EEOC) and received a right to sue letter from the EEOC dated on or about August 13, 2020.

11. The discriminatory actions of the Defendant as aforesaid were intentional, willful and taken in malicious and wanton disregard for the rights of Plaintiff .

WHEREFORE, the Plaintiff, DeBorah L. Horne, prays that this honorable Court enter an Order that:

A. Declares that the discriminatory practices of the Defendant, as set forth above, violate 42 U.S.C. §§2000(e), et seq., 29 U.S.C. §§621, et seq., 29 U.S.C. §§701, et seq. and 42 U.S.C. §§12101, et seq.;

B. Enjoins the Defendants, their agents, employees, and successors, and all other persons in active concert or participation with any of them, from discriminating on the base of race, color, sex, familial status, disability and/or national origin in any aspect of their employment;

C. Awards such damages as would fully compensate Plaintiff due to Defendants' discrimination and for injuries caused by Defendants' discriminatory actions including but not limited to back pay and reinstatement to his former position, as well as attorneys fees and costs;

D. Awards punitive damages to Plaintiff as a result of Defendants

discriminatory practices as alleged, and,

E. Such other and further relief as the interests of justice so require.

Respectfully submitted,

\_\_\_\_\_  
/s/

Robert E. Joyce  
Federal Bar I.D. #26427  
Law Office of Barry R. Glazer, LLC  
P.O. Box 27166  
1010 Light Street  
Baltimore, MD 21230  
(443) 904-5706

Attorney for Plaintiff

**PRAYER FOR JURY TRIAL**

Plaintiff, LeVerne D. Peoples, Sr., by and through undersigned counsel, hereby respectfully requests a jury trial in this matter.

Respectfully submitted,

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/s/

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Attorney for Plaintiff